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October 10, 2017

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VIA ELECTRONIC FILING

Marlene H. Dortch
Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Washington, DC 20554

Re: *Intelsat License LLC and Intel Corporation Notice of Ex Parte Presentations*
GN Docket No. 17-183

Dear Ms. Dortch:

Pursuant to Section 1.1206 of the Federal Communications Commission's ("FCC" or "Commission") rules, this letter provides notice that on October 6, 2017, representatives of Intelsat License LLC ("Intelsat") and Intel Corporation ("Intel") held four meetings with FCC Commissioners, legal advisors and staff as described in Attachment A.

During each meeting, Intelsat and Intel discussed their market-based approach to facilitate joint use of the 3.7-4.2 GHz band by satellite and terrestrial mobile operators, as proposed in their joint comments submitted in response to the FCC's Notice of Inquiry on flexible use of mid-band spectrum.¹ Intelsat and Intel also provided the FCC meeting participants with a copy of the "Intelsat and Intel Corporation Spectrum Solution Proposal - Fact Sheet" included here as Attachment B.

Please contact the undersigned with any questions regarding this letter.

Respectfully submitted,

/s/ Jennifer D. Hindin
Jennifer D. Hindin
Wiley Rein LLP

Counsel to Intelsat License LLC

¹ Joint Comments of Intelsat License LLC and Intel Corporation, *Expanding Flexible Use in Mid-Band Spectrum Between 3.7 and 24 GHz*, GN Docket No. 17-183 (filed Oct. 2, 2017).



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Attachment A

Meeting 1

FCC: Commissioner Brendan Carr and Kevin Holmes, Acting Legal Advisor for Wireless and Public Safety.

Intelsat and Intel: Susan H. Crandall, Associate General Counsel of Intelsat, Peter K. Pitsch, Executive Director, Communications Policy and Associate General Counsel, Intel and Jennifer D. Hindin and Gregg Elias, Wiley Rein LLP, counsel to Intelsat.

Meeting 2

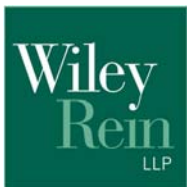
FCC: Rachael Bender, Wireless and International Advisor to Chairman Ajit Pai.

Intelsat and Intel: Susan H. Crandall, Associate General Counsel of Intelsat, Peter K. Pitsch, Executive Director, Communications Policy and Associate General Counsel, Intel and Jennifer D. Hindin and Gregg Elias, Wiley Rein LLP, counsel to Intelsat.

Meeting 3

FCC: Erin McGrath, Legal Advisor, Wireless, Public Safety and International to Commissioner Michael O'Rielly.

Intelsat and Intel: Susan H. Crandall, Associate General Counsel of Intelsat, Peter K. Pitsch, Executive Director, Communications Policy and Associate General Counsel, Intel and Jennifer D. Hindin and Gregg Elias, Wiley Rein LLP, counsel to Intelsat.



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Meeting 4

FCC: Donald Stockdale, Chief, Wireless Telecommunications Bureau (“WTB”); Tom Sullivan, Acting Chief, International Bureau (“IB”); Julius Knapp, Chief, Office of Engineering & Technology (“OET”); Blaise Scinto, Chief, WTB Broadband Division; Peter Daronco, Deputy Chief, WTB Broadband Division; Ariel Diamond, WTB; Nese Guendeslberger, Senior Deputy Bureau Chief, WTB; Michael Ha, Deputy Chief, Policy and Rules Division, OET; Nicholas Oros, OET; Ronald Repasi, Deputy Chief, Officer of the Chief Engineer, OET; Jamison Prime, Chief, Policy and Rules Division, OET; Jose Albuquerque, Chief, Satellite Division, IB; Robert Nelson, Chief Engineer, IB; Jim Schlichting, Senior Deputy Chief, IB; and Dana Shaffer, Deputy Bureau Chief/Chief of Staff, WTB (via telephone).

Intelsat and Intel: Susan H. Crandall, Associate General Counsel of Intelsat, Hazem Moakkit, VP, Corporate and Spectrum Strategy, Intelsat, Peter K. Pitsch, Executive Director, Communications Policy, and Associate General Counsel, Intel, and Jennifer D. Hindin and Henry Gola, Wiley Rein LLP, counsel to Intelsat.



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Attachment B

**Intelsat and Intel Corporation
Spectrum Solution Proposal – Fact Sheet**

Intelsat and Intel Corporation

Spectrum Solution Proposal – Fact Sheet

What's happening?

Intelsat, one of the world's largest commercial satellite operators, and Intel, one of the world's leaders in computing and communications technologies, have submitted a joint proposal under a current Federal Communications Commission (FCC) Notice of Inquiry regarding expanding the use of the 3700-4200 MHz spectrum from satellite services to terrestrial mobile services. If the proposal is adopted, wireless operators would be able to access new "mid-band" spectrum that would help accelerate the introduction of 5G services, benefitting American consumers.

Intelsat and Intel have proposed a market-based approach that will make available the necessary radio spectrum beginning approximately 1-3 years following FCC adoption – far faster than if the FCC had to impose new regulations impacting a wide variety of communications companies that include incumbent satellite and fixed terrestrial operators, mobile network providers and television broadcasters.

Terrestrial mobile companies or other interested parties will be given the opportunity to use the spectrum they need by reaching commercial agreements with the current holders of the spectrum rights, satellite licensees, such as Intelsat.

Why is this necessary?

Facilitating access to mobile broadband spectrum is one of the great public policy challenges facing the FCC.

C-band spectrum in 3700-4200 MHz, is currently used by satellite operators to enable all of the major broadcasters and media companies to deliver television content to millions of viewers across the United States. It is also used for telecommunications infrastructure, certain governmental aeronautical applications and private data networks in the United States.

Intelsat believes that joint use in the same frequency by both mobile and satellite services involves complex technical issues that could result in impairment of the satellite signals and unless carefully coordinated, this could mean interruptions to the TV broadcasts enjoyed by hundreds of millions of Americans.

The FCC has already indicated that it would like for new spectrum to be enabled to support mobile services. However, based on past experience of new spectrum rulings which took over a decade, it could take many years for the FCC to bring about a reallocation of spectrum because it will be opposed and litigated by those whose commercial interests could be damaged. Our market-based proposal provides an accelerated solution.

Who will benefit?

- Mobile operators will have the opportunity to obtain expanded spectrum in metropolitan regions, encouraging the roll out of 5G services
- Satellite operators and their customers will have certainty regarding their investments in infrastructure based upon C-band spectrum. These customers will have confidence that the quality of their satellite-based distribution networks will be protected, and that their advertisers and viewers can continue to rely upon high quality and reliable content distribution.

- Ultimately, the U.S. economy will benefit as 5G networks are more rapidly deployed, providing growth for technology companies and the socio-economic benefits of a population that is connected to the most advanced mobile broadband infrastructure.

How will it work? What is the market-based solution?

Subject to approval by the FCC, Intelsat and other satellite companies that participate will make available a portion of the 3700-4200 GHz C-band spectrum in certain geographies to allow it to be used for terrestrial mobile 5G services.

The ability to reach commercial agreements with mobile network operators will enable the satellite companies to make the technical and operational adjustments to allow joint satellite and terrestrial mobile use of the spectrum using a competitive, market-based process. This will ensure that the spectrum is used by the parties who value it most highly –maximising benefits to the public. Intelsat and other satellite operators C-band spectrum rights would remain unchanged.

The parties believe that the current rights holders of the spectrum are in the best position to determine and execute the necessary technical and operational changes necessary to make joint-use a possibility.

What are the technical challenges to making this a reality?

Satellite operators will work cooperatively to identify geographic areas of the country where they could undertake the complicated and costly process of clearing portions of the C-band for terrestrial use. The technical solutions could include several approaches, including transitioning their services and customers to another portion of the licensed C-band spectrum, physically moving ground antennas outside of the identified geographic area, or other means, as appropriate. This spectrum clearing will occur at significant cost, including lost opportunities, to incumbent satellite operators in the identified frequencies and geographic areas. Yet overcoming these challenges will unleash the myriad benefits of 5G for consumers and help cement American 5G leadership.

Why is Intel involved? How will it benefit?

Along with many other technology companies, including Intelsat, Intel believes that the 5G era will encourage an explosion in the number of connected devices, with the total expected to run into the billions. Intel technology powers devices from the edge of the network to the cloud with industry leading hardware, software, security and services. As a technology leader, Intel continues to advocate policies that will enable consumers to benefit from innovations in technology. 5G has the potential to create new experiences in every part of our lives – from smart cars to connected homes and virtual reality to rich entertainment.

What is the objective?

This proposal creates a framework for joint use of spectrum between the satellite and wireless sectors. The market-based approach will result in an accelerated solution that will facilitate accelerated deployments of terrestrial mobile 5G networks. At the same time, it will provide the certainty necessary to maintain the reliability and quality of the satellite services, which is vitally important to the media community and other satellite users. It encourages the development of 5G infrastructure, which will provide expanded outlets for distribution of content, and create a stronger economy.

Intelsat and Intel welcome others in the industry to join in supporting this market-based solution.

For more information, please contact:

Intelsat

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